



Sprint Nextel
DCWASP0701 – 719
900 7th St., N.W., Suite 700
Washington, DC 20001 USA
Office: (703) 592-5209 Fax: (202) 585-1940
E-mail: David.A.Nall@sprint.com

David A. Nall
Senior Counsel – Government Affairs

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BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, D.C. 20554

**RE: Ex parte presentation: IB Docket No. 04-112 – Reporting Requirements of
U.S. Providers of International Telecommunications Services**

Dear Ms. Dortch:

On October 9, 2012, the undersigned, representing Sprint Nextel Corporation (“Sprint”), spoke by telephone with Angela Kronenberg of Commissioner Cliburn’s office about the above-referenced proceeding, as a follow-up to the voice mail left earlier that day.

Specifically, Sprint noted its concern about the confidentiality of the data filed under the Part 43 international reporting rules. As explained in Sprint’s comments of August 18, 2011 in this proceeding, this data could be exploited by certain parties on a country-by-country basis seeking to elevate the amount of settlement payments made by U.S. carriers to foreign correspondents. This is because Sprint, like most U.S. international carriers, is engaged in “hubbing” or re-origination, whereby carriers route traffic through intermediate carriers in third countries to take advantage of lower termination rates from such third countries to the destination country, i.e., least-cost routing. Parties that have sought Sprint’s proprietary data through the FOIA process are in fact often retained by foreign governments and carriers seeking to exploit differences between declared settlements totals and the route traffic data reported to the Commission, which includes data on traffic that is re-originated through intermediate carriers in third countries. If these parties can obtain access to U.S. carriers’ route-by-route traffic data and can use such data successfully in legal and regulatory proceedings in foreign countries, the result would be higher settlement payments by Sprint and other U.S. carriers, and higher costs for U.S. consumers making international calls. A “sunset” for the confidentiality of route-by-route data would merely postpone this consequence, as foreign carriers (often owned or supported by their governments) would simply bill in arrears. Sprint urges that the Commission not alter its rules with respect to the confidentiality of the international traffic and revenues data filed under Part 43, and that the release of such data remain subject to the current FOIA process in place.

Sincerely,

A handwritten signature in dark ink, appearing to read "David A. Nall", written in a cursive style.

David A. Nall

CC: Angela Kronenberg (by email)